UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

WILLIAM SOTO, DOMINGO TOLENTINO, and LUIS VIRUET, individually and on behalf of all persons similarly situated,

Plaintiffs.

No. 19 Civ. 6691 (SJB)

NOTICE OF MOTION

-against-

HOUSLANGER & ASSOCIATES, PLLC, TODD HOUSLANGER, and BRYAN BRYKS,

Defendants.

PLEASE TAKE NOTICE, that upon the Memorandum of Law in Support of Plaintiffs' Motion for Provisional Certification of a Settlement Class and Preliminary Approval of Class Action Settlement, and the June 23, 2022 Declaration of Danielle Tarantolo in Support of Provisional Certification of a Settlement Class and Preliminary Approval of Class Action Settlement and its exhibits, Plaintiffs, by their attorneys the New York Legal Assistance Group ("NYLAG"), will move this Court before the Honorable Sanket Bulsara, United States Magistrate Judge, at the United States Courthouse for the Eastern District of New York, at 225 Cadman Plaza, Brooklyn, NY, on a date to be determined by the Court, for an Order:

i. provisionally certifying this case as a class action for settlement purposes pursuant to Rule 23(a), (b)(2), and (b)(3) of the Federal Rules of Civil Procedure, on behalf of a class defined as "All individuals against whom Houslanger & Associates, PLLC, Todd Houslanger, or Bryan Bryks, on or after April 19, 2016, have issued an Execution on an Assigned Judgment obtained in New York City Civil Court."

- (i) appointing NYLAG as Class Counsel and approving Atticus Administration, LLC as the Class Administrator;
- (ii) granting preliminary approval to the settlement of this class action, including the proposed allocation plan and the form, content, and manner of notice to the Class;
 - (iii) directing the provision of notice to the Class;
- (iv) scheduling a date for a Fairness Hearing, at which time the Court will determine whether to grant final approval of the settlement; and
 - (v) granting such other relief as the Court deems just and proper.

Dated: June 23, 2022

New York, New York

LISA RIVERA, ESQ.

New York Legal Assistance Group 100 Pearl Street, 19th Floor New York, NY 10004 (212) 613-5000 dtarantolo@nylag.org

DANIELLE TARANTOLO, of Counsel **JESSICA RANUCCI**, of Counsel

Counsel for Plaintiffs